



Department for Business Innovation & Skills

Apprenticeship Reforms

Equality Impact Assessment

August 2014

Equality Impact Assessment of:

Apprenticeship Reforms

*As set out in *The Future of Apprenticeships in England: Implementation Plan*, October 2013, developed and implemented through *Trailblazers* in 2014*

28 August 2014

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Title of policy

- 1) Apprenticeship Reforms as set out in “The Future of Apprenticeships in England: Implementation Plan”, October 2013¹, developed and implemented through Trailblazers in 2014²

Introduction

- 2) This document provides the Equality Impact Assessment (EqIA) for the Apprenticeship reforms specified in paragraph 1. It has been informed by the experience of working with the Trailblazer employers who are developing new Apprenticeship standards in the first 37 sectors (8 in Phase 1, 29 in Phase 2) announced as part of the reforms. Delivery of the reforms through the trailblazers provides the opportunity to learn key lessons on a variety of issues, including equality, ahead of full implementation from 2017/18.
- 3) Any queries about this EqIA should be addressed to the Apprenticeships Unit correspondence mailbox: aucorrespondence@bis.gsi.gov.uk.
- 4) Annex A sets out additional data on the current system, demonstrating what monitoring data will be captured under the reformed programme. Annex B sets out the analysis of the equality impact of the original maths and English reform which was subsequently revised. A list of those organisations and individuals involved in the consultation process is provided at Annex C.

Scope of this Equality Impact Assessment

- 5) On 5 April 2011 the new public sector Equality Duty came into force. The Equality Duty replaces the three previous duties on race, disability and gender, bringing them together into a single duty, and extends it to cover age, sexual orientation, religion or belief, pregnancy and maternity, and gender reassignment (as a whole these are called protected characteristics or protected groups). Based on a proportional analysis we will outline the potential impacts, both positive and negative, on these protected groups.
- 6) The law requires Government departments, and all public bodies, to demonstrate they are making decisions in a fair, transparent and accountable way, considering the needs and rights of different members of their community, by demonstrating they have paid 'due regard' to equality issues in the decision making process. This is achieved through assessing the impact that changes to policies, procedures and practices could have on differing groups in society.
- 7) Assessing the impact of proposed changes in this way, also offers a positive opportunity to ensure we make better decisions based on the available evidence.
- 8) Public bodies must have due regard to the need to:
 - a) eliminate unlawful discrimination, harassment, and victimisation;
 - b) advance equality of opportunity; and

¹ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/253073/bis-13-1175-future-of-Apprenticeships-in-england-implementation-plan.pdf

² See https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/287276/bis-14-p194-future-of-Apprenticeships-in-england-guidance-for-trailblazers-revised-version-2.pdf

- c) foster good relations.
- 9) This general duty is underpinned by specific duties, to help public bodies perform better by ensuring that new policies take into consideration the impact on groups with protected characteristics listed above at paragraph 5.
- 10) It should be noted that no data are available for gender reassignment, marriage and civil partnership, pregnancy and maternity, religion or belief and sexual orientation relating to the Apprenticeship programme currently. The scope of this assessment, therefore, is focused on whether the following groups with protected characteristics may be disproportionately affected by the Apprenticeship reforms:
 - a) Age
 - b) Disability
 - c) Gender
 - d) Ethnicity (race)
- 11) In terms of those groups for which data was unavailable, the absence of any concerns raised in the public consultation provides some reassurance that the reforms will not have any significant impact.

Description of the policy

- 12) Apprenticeships are at the heart of the Government's drive to give people of all ages the skills employers need to grow and compete. Apprenticeships are a demand led programme. They are real jobs with training and the locations and sectors where Apprenticeships are available are determined by employers offering Apprenticeships and recruiting Apprentices.
- 13) The Apprenticeships programme is already successful and provides proven benefits to both employers and Apprentices. However, Doug Richard was asked to conduct an independent review of the Apprenticeship programme to answer the question: What should an Apprenticeship be in the future, and how can Apprenticeships meet the needs of the changing economy? He published his recommendations for reform in November 2012. These included:
 - i) Apprenticeships should be redefined to be clearly targeted at those who are new to a job or role, and that job or role must require sustained and substantial training.
 - ii) Apprenticeship should be based on industry defined standards, and industry should compete to design the best standard.
 - iii) Assessment should be focused at the end, to test application of skills and knowledge in a real world scenario, be independent and be trusted by employers.
 - iv) All Apprentices should have achieved Level 2 in English and maths before they can complete their Apprenticeship.
 - v) We should free up the training process. Employers and providers should be free to design their own training programmes to get someone to the new standard.
 - vi) Government should promote good quality training and ensure employers and Apprentices are well informed.
 - vii) Funding should be reformed to give employers the purchasing power.
- 14) The government welcomed the Richard Review and consulted on the implementation of these recommendations. Following this consultation the government published The Future of Apprenticeships in England -

Implementation Plan³, on 28 October 2013. This set out the Government's vision for the future of Apprenticeships and launched 'Trailblazer' projects through which the new vision would be tested and implemented.

15) There are three key strands to the reforms:

- a) Increasing the quality of Apprenticeships through higher expectations of English and maths; independent end assessment of an Apprenticeship to ensure full competence; and the introduction of grading for Apprenticeship completion.
- b) Putting employers in the driving seat of Apprenticeships - future Apprenticeships will be based on standards and assessment approaches designed by employers.
- c) Radical simplification of the system with new employer-led standards, being short and easy to understand and describing the skills and knowledge an individual needs to be fully competent in an occupation.

16) These aims will be further supported by reforms to the funding system that will give greater control to employers.

17) Additionally, as part of the reforms we have required that all Apprenticeships last a minimum of 12 months. We have removed the concession previously available to Apprentices over the age of 19 where prior achievement is acknowledged and a reduced funding rate drawn down. Duration is important to ensure Apprentices of all ages get a high quality programme, with substantial and sustained training.

18) The reformed Apprenticeship programme will also require 20% of training to be off-the-job. This is a slight change from the current requirement set out in the Specification of Apprenticeship Standards in England, that 30% of an Apprentice's training should be off-the-job.

19) Apprenticeships are an all-age programme and will continue to be under the reforms. They will be available to any individual who requires substantial or sustained training to reach full competency in their chosen occupation.

20) The Government is working closely with employer-led Trailblazers, who are leading the way in implementing the changes to ensure that they work for business. The Trailblazers are made up of large and small employers in their sectors. These employers have been collaborating to design short and clear Apprenticeship standards for occupations within their sector to make them world-class. Greater employer engagement will drive up the quality of Apprenticeships, to ensure they deliver the skills the economy needs and that Apprentices need to have successful careers.

21) This Trailblazer activity will help to create a sustainable employer model for future Apprenticeship development. The first Trailblazers were announced in October 2013 and a second phase on 4 March 2014⁴. The two academic years 2015/16 and 2016/17 will be the key period of transition to full implementation of the

³ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/253073/bis-13-1175-future-of-Apprenticeships-in-england-implementation-plan.pdf

⁴ <https://www.gov.uk/government/publications/future-of-Apprenticeships-in-england-guidance-for-trailblazers>

reforms with the aim that from 2017/18, all new Apprenticeship starts will be on the new standards.

- 22) During this period of transition we will continue to assess the impact of the reforms as they move from the policy to implementation stage, to gauge whether any impacts are felt disproportionately by any of the groups with protected characteristics.
- 23) The Government also announced reforms for the funding of Apprenticeships within the Chancellor's Autumn statement (5th December 2013)⁵. Further clarification was provided in the Funding Reform Technical Consultation (March 2014)⁶. The key policy changes announced on the funding are set out below:
- a) support Apprenticeships for young people aged 16 and 17 by contributing to the additional development costs employers may incur;
 - b) provide additional support to smaller businesses taking on Apprentices that are working towards the new standards;
 - c) co-invest with employers in the external training and assessment required to meet - and be assessed against - the Apprenticeship standard, up to the Maximum Government Contribution for the standard; or contribute towards the costs of training and assessment being provided by an employer;
 - d) support Apprentices of any age to achieve English and maths up to and including the minimum of Level 2;
 - e) incentivise employers to ensure their Apprentices complete their training by incorporating a Payment By Results (PBR) element into the funding model;
 - f) support people with learning difficulties or disabilities to undertake Apprenticeships by meeting the full costs of reasonable adjustments and support, to enable them to compete on a par with other Apprentices

The evidence base

- 24) The analysis in this EqIA has been informed by the following evidence sources:
- a) The Individualised Learner Record
 - b) Further education and skills: statistical first release 31st January 2014
 - c) Research findings from the 2012 Apprenticeship Evaluation of Employers Survey
 - d) Research findings from the 2012 Apprenticeship Evaluation of Learners Survey
 - e) Responses to the consultation for "The Future of Apprenticeships in England: Next Steps from the Richard Review"
 - f) DfE matched admin data (2011/12)
 - g) Prior Qualification Survey (2011/12)
 - h) Literature reviews of relevant published research
 - i) Consideration of published findings of GCSE qualification reform

Involvement and Consultation

- 25) The Apprenticeship Unit, which sits across the Department for Business Innovation and Skills and Department for Education, has had regular dialogue

⁵https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/263942/35062_Autumn_Statement_2013.pdf

⁶<https://www.gov.uk/government/consultations/Apprenticeship-funding-reform-in-england-payment-mechanisms-and-funding-principles>

with representatives from groups with an interest in disabilities. The disability reference group (including representatives from providers, awarding organisations) last met in the summer of 2013.

- 26) We have consulted the BIS Central Equality & Diversity team who concluded it was not necessary to submit to the internal peer review group.
- 27) The Government held a public consultation on Apprenticeship reform proposals set out in *The Future of Apprenticeships in England: Next Steps from the Richard Review*⁷ and asked a specific question on the potential impact of reforms on groups with protected characteristics:

Question 23: Do you consider that the proposals set out in this document would have a positive or negative impact on any group, including those with protected characteristics? Please provide any comments or evidence you have for your answer and set out which aspects of the reforms will impact and how these impacts might be managed.

- 28) During the consultation period we monitored the types of organisations who were responding. Annex C lists those organisations consulted. We recognised that we had not received responses from many organisations or individuals representing the interests of groups with protected characteristics. We therefore directly approached the following groups to encourage them to contribute, and extended the deadline of the consultation to allow them to do so:

- a) ROTA- Race on the Agenda
- b) BTEG- Black Training and Enterprise Group
- c) Runnymede Trust
- d) Fawcett Society
- e) Stonewall
- f) Radius Disability Services
- g) The Equality and Diversity Forum

Following this more targeted consultation, a response was received from Runnymede while the other groups chose not to respond.

- 29) Question 23 was answered by 244 respondents, out of a total of 334 responses received. The most frequent comments in response to this question were
- a) That the proposed L2 English and maths requirement would have a negative impact (30%)
 - b) That the proposals in general would have a negative impact on those with disabilities (21%)
 - c) That the proposals would have a negative impact generally, or for those who are long term unemployed / care leavers / NEET / not native English speakers / or from disadvantaged groups (17%)
 - d) That the proposals for end point and external testing and off-site training may have a negative impact. (16%) Several respondents referred to vulnerable groups in general, whilst several others highlighted that the disabled and young people with and learning difficulties such as dyslexia would be affected

⁷ <https://www.gov.uk/government/consultations/future-of-apprenticeships-in-england-richard-review-next-steps>

Key facts and findings

- 30) This section outlines the assessment of evidence for each of the main elements of the reforms on groups with the protected characteristics of age, gender, disability and race.
- 31) In addition to the in-depth assessment of the impact of the policy which we have carried out, available data will allow us to monitor the true impacts when the changes are implemented. Tables A1 to A5 in Annex A summarise data relating to the current system as an illustration of what will be monitored following implementation of the reforms. Furthermore, delivery of the reforms through trailblazers will allow key lessons to be learnt on a variety of issues, including equality, ahead of full implementation from 2017/18.
- 32) This section includes some comparative analyses that rely on judgements as to what size of difference should be considered significant. These judgements follow the rule of thumb, agreed by BIS and DfE analysts, that, in this particular context, a difference of less than ten percentage points is insignificant, a difference of between ten and twenty percentage points is marginal but worthy of on-going monitoring, while a difference of more than twenty percentage points is likely to be significant and therefore worthy of further consideration.

English and maths policy

- 33) Following responses to the consultation and analysis (set out in Annex B) the decision to *require* all Apprenticeships to achieve Level 2 English and maths was reversed. This was to ensure Apprenticeships can still be accessed by those with lower initial attainment in English and maths and learners to whom achievement of Level 2 may have been a barrier to completion of their Apprenticeships, including some Apprentices with learning difficulties or disabilities. However, the requirement for all Apprentices to work towards and take the test for Level 2 will ensure all Apprentices have access to higher level skills gain and the opportunity to achieve this higher qualification.
- 34) Our policy position on English and maths in the reformed Apprenticeship programme is therefore as follows:
 - a) All Apprentices working towards entry level (Intermediate) Apprenticeships are required to study and take the test for Level 2 English and maths, if not already achieved. They are expected to achieve at least level 1 English and maths qualifications prior to taking the end test (if they have not already achieved at that level). The requirements can be met with Functional Skills or GCSEs and the ambition is to only accept GCSE in future;
 - b) Apprentices on Advanced and Higher Apprenticeships will be required to achieve level 2 English and maths.
- 35) These changes mean that there are no major differences between the current programme and the reformed programme because the intention is for Apprenticeships to be accessible to all, regardless of age, ethnicity, disability or other characteristics. The only exception is the reintroduction of the requirement to achieve level 2 English and maths in Higher Apprenticeships (which was removed in April 2013). It is expected that few Higher Apprentices will not already have English and maths qualifications at level 2 or higher and that this change

should therefore have no significant impact. Unfortunately we do not yet hold enough information on Higher Apprenticeships to be able to confirm this so we will continue to monitor the impact of this change as reformed Apprenticeship numbers increase.

End point Assessment policy

- 36) In the reformed Apprenticeship programme an Apprentice will need to demonstrate their competence through rigorous independent assessment, focussed primarily on testing their competence at the end of their Apprenticeship. This end point assessment has been introduced in response to criticism from employers that an Apprentice in the current system is able to pass the composite qualifications without necessarily being competent when judged holistically. The end assessment will look at the Apprentice in a holistic way and assess them across the standard to ensure they have met full occupational competency, as set out in the new Apprenticeship standards. The end assessment would not necessarily be a single exam. It could, for example, be comprised of a sequence of assessments concentrated towards the end of the programme.
- 37) As part of development of the policy announced in the implementation plan, a review was made of the research evidence on the differences in educational performance for academic qualifications by gender and disability for
- a) linear routes (examinations at end of the course) compared with modular routes (assessment throughout the course) to understand the implications of introducing the end point assessment, and
 - b) external assessment compared with internal assessments to understand the potential impacts of the introduction of independence.
- 38) Additionally, the opportunity has been taken to review Ofqual's report into the potential impacts on groups with protected characteristics arising from the reforms to GCSEs, (Equality Analysis Report, published November 2013⁸) to see if it could provide any insights into potential issues as development of assessment approach is on-going and being tailored to the needs of employers within sectors

Age

- 39) We did not find any evidence to inform an initial screening assessment. Though we can confirm that Ofqual did not identify any negative impacts on students because of their age as a result of a move from modular to linear assessment in GCSEs (Equality Analysis Report, section 3.1)

Disability (Special Educational Needs and Disability)

- 40) Our literature review revealed that there is a lack of evidence on the effect of linear and modular assessment on pupils with special educational needs. It showed that there is a lack of accessible evidence on the relationship between SEND and performance in different modes of assessment.

⁸ Ofqual "Equality Analysis of GCSE Reforms" - <http://comment.ofqual.gov.uk/gcse-reform-june-2013/>

- 41) Ofqual stated in their “GCSE Reform Equality Analysis: Literature Review”⁹ that “pupils with physical disabilities affecting their energy levels or abilities to concentrate for extended periods may have problems demonstrating their complete and true capabilities with an assessment regime confined to one concentrated period of three hours upon which their entire course of study is evaluated”. However they found little research to substantiate these concerns.

Gender

- 42) Overall, the evidence is inconclusive on the relationship between modular assessment and gender.
- a) Rodeiro and Nadas (2010)¹⁰ report that worse outcomes in early exam sessions during the course of the programme in English GCSE were more marked for girls. This is in line with previous research showing that boys are more likely to take advantage of modular exams (McClune 2001);¹¹
 - b) In GCSE mathematics, however, average marks were higher in earlier sessions in the programme than in later sessions for both boys and girls (Roderio and Nadas 2010); and
 - c) In a study on the effects of modular curriculum delivery on one school in New Zealand, (Mcgee 1996)¹² found no effects of gender.
- 43) In respect of internal versus independent assessment, overall our research review suggests that although coursework may play a minor role in the gender attainment gap, the social and pedagogical processes underlying the teaching and learning of boys and girls are far more complex than the coursework debate acknowledges:
- a) Stobart et al (1992)¹³ found that the increased coursework content in GCSE exams was only partly responsible for the improvement in girls’ grades at the transition between O-level and GCSE. Coursework was an influential factor but not the defining factor in raising girls’ achievement.
 - b) From 1988 to 1994, it was possible for schools to enter their pupils for GCSE English based on 100% coursework. Elwood (1995)¹⁴ reported that the gender gap in favour of girls in English GCSE results for this period was more pronounced for syllabuses with less coursework than for syllabuses with 100% coursework. If coursework particularly benefited girls’ final grades, the opposite result would be expected.
 - c) (Elwood, 1995) found that girls do relatively better on coursework than on examinations, but only marginally.
 - d) Coursework tends to have a higher influence over final grades for boys than

⁹ Ofqual “Annex 2 – GCSE Reform Equality Analysis : Literature Review “ – <http://comment.ofqual.gov.uk/gcse-reform-june-2013/>

¹⁰ Rodeiro, C.L. and Nadas, R. (2010). Effects of modularisation. Cambridge: Cambridge Assessment

¹¹ McClune, B. 2001. Modular A-levels – Who are the winners and losers? A comparison of lower-sixth and upper-sixth students’ performance in linear and modular A-level physics examinations. Educational Research 43, no. 1: 79–89.

¹² McGee, C. and Hampton, P. (1996). The effects of modular curriculum delivery on a New Zealand secondary school. In School Organisation, 16 (1). Pp. 7-16

¹³ Stobart, G.; Elwood, J. and Qurnlan, M. (1992). Gender bias in examinations: how equal are the opportunities. In British Educational Research Journal, 18, pp. 261-276

¹⁴ Elwood, J. (1995) Undermining gender stereotypes: examination and coursework performance in the UK at 16. Assessment in Education, 2, 283-303

for girls. Elwood (1995 and 1999¹⁵) measured the standard deviation of coursework marks for both boys and girls (assuming that the greater the deviation the more potential influence the coursework component has over the final grade). In this study the contribution of coursework marks was addressed through the analysis of the 'achieved weighting' of components. This analysis takes into account not only the mean marks but the spread of marks and the correlations between component and subject marks. Both studies found that boys' marks deviated more than girls meaning that, although boys tend to achieve lower marks than girls, coursework marks tend to have a higher influence over final grades for boys than they do for girls.

- e) Girls outperform boys in most types of coursework (Elwood, 1995). Elwood (1995) found that girls tended to do better on virtually all types of coursework as it required the organisation of diverse ideas and the writing of coherent paragraphs (boys were better at multiple choice questions requiring discrimination among responses).
 - f) Bishop et al (1997)¹⁶ reported that more girls than boys expressed preference for coursework. Reasons for this may include findings reported by Arnot et al (1998)¹⁷ in a summary of gender related research, including that girls are more attentive in class and more willing to learn.
- 44) Ofqual reported that, in their consultation, a number of people had asserted that girls would be adversely affected by the removal of controlled assessment relative to boys. Ofqual had referred to such views in their initial analysis and that there was a lack of conclusive evidence to support this position. They also analysed the relative performance of girls and boys in GCSE English between 1990 and 2000 and GCSE mathematics between 1988 and 1998 and found that these findings did not support the view that girls have benefitted more than boys in the use of non-exam assessment (Equality Analysis Report: Annex F.2). They also looked at the results of the National Curriculum assessments testing component at Key Stage 2 (KS2) and concluded that in this context girls could perform at least as well as boys and helped to support the findings in their Annex F.2. They noted that the age difference between KS2 and GCSE needs to be taken into account and it was not known whether girls at KS2 would have performed at an even higher level if the testing component was coursework-based.
- 45) Overall we judge that there is no conclusive evidence that end point assessment and/or independent assessment favours males over females or vice versa.

Ethnicity

- 46) We have been unable to find any evidence to inform a screening assessment. One risk that we have identified is that students who have fasting periods as part of their religious beliefs may be affected by the move to end-point assessment at a fixed point in time. Ongoing monitoring of management information will allow us to identify any significant changes to the ethnic breakdown of Apprentices that may have resulted from this change.

¹⁵ Elwood, J. (1999) 'Equity issues in performance assessment: The contribution of teacher-assessed coursework to gender-related differences in examination performance'. *Educational Research and Evaluation*, 5(4) pp321 - 344

¹⁶ Elwood, J. (1999) 'Equity issues in performance assessment: The contribution of teacher-assessed coursework to gender-related differences in examination performance'. *Educational Research and Evaluation*, 5(4) pp321 - 344

¹⁷ Arnot, M., Gray, J., James, And Ruddock, J. (1998) *Recent research on gender and educational performance*. London. OFSTED. Cited in Elwood (2005)

Grading policy

- 47) Within the Implementation Plan, a Fail; Pass; Merit; Distinction grading scale for the full Apprenticeship standard was proposed. Apprentices would need to pass every aspect of their Apprenticeship in order to be successful, but not every aspect would need to be graded.
- 48) The policy was clarified with the "The Future of Apprenticeships in England Guidance for Trailblazers - Version 2 – March 2014, which stated that as a minimum, grading will be applied to the end point assessment and a pass will demonstrate full competence. The grading scale now also only requires one grade above a pass.
- 49) There is limited or inconclusive evidence on whether different assessment approaches and grading impact differently on groups with protected characteristics. The exact nature of the end point assessment and grading will be determined by the employers who set the standard, to ensure the assessment process is in line with real world demands of the occupation.

Removal of minimum duration flexibilities for Apprentices over 19

- 50) On 1st August 2012 new rules on minimum durations for Apprenticeships were implemented which required all Apprenticeships to last a minimum of 12 months, with the exception of 19+ learners with prior learning or attainment. These learners could complete Apprenticeships in less than 12 months, if reduced funding was claimed because less training was required. This flexibility will be removed under reformed Apprenticeships.

Age

- 51) Table 1 shows that around a third of 19+ Apprenticeships are achieved in fewer than 12 months but that there is little difference between Apprentices aged 19-24 and those aged over 25. Therefore the reform may have a disproportionate impact on 19+ learners as intended (in order to drive up quality for this age group) but is not likely to affect 19-23 year olds more or less than 25+ year olds.

Table 1: 2012/13 Length of stay for Apprenticeship framework achievements by age (2012/13)

Age	Percentage of Achievements with LOS of 364 or fewer days
16-18	21%
19-23	33%
24+	31%

- 52) One of the key reasons why the flexibility was introduced was to ensure that older learners with some prior knowledge or experience were not disadvantaged, as the flexibility allows them to complete in less than a year, provided less funding is

claimed by the provider to reflect that less training is required. The reforms around training and funding will ensure that prior learning can be recognised in the future programme and therefore older learners will not be disadvantaged: by freeing the price of training and allowing employers to work with providers to develop their own training programmes in the future, the Apprenticeship programme will be tailored to the specific requirements of an Apprentice. Requiring 12 months duration ensures all Apprentices, regardless of age, will benefit from a programme of substantial and sustained training.

Disability

53) Table 2 suggests that there is no significant difference in length of stay on the basis of learners' disability. Therefore the reforms should not have a disproportionate impact on people with this protected characteristic.

Table 2: All Age Apprenticeship Framework Achievements for learners registered LLDD by Length of Stay (2012/13)

<i>Disability</i>	<i>Percentage of Achievements with LOS of 364 or fewer days</i>
LLDD	27%
non LLDD	29%

Gender

54) Table 3 suggests that there is no significant difference in length of stay on the basis of learners' gender. Therefore the reforms should not have a disproportionate impact on people of a particular gender.

Table 3: All Age Apprenticeship Framework Achievements by Gender and Length of Stay (2012/13)

<i>Gender</i>	<i>Percentage of Achievements with LOS of 364 or fewer days</i>
Female	30%
Male	28%

Ethnicity

55) Table 4 suggests that there is no significant difference in length of stay on the basis of learners' ethnicity. Therefore the reforms should not have a disproportionate impact on people with this protected characteristic.

Table 4: All Age Apprenticeship Framework Achievements for those registered BAME by Length of Stay (2012/13)

<i>Ethnic Group</i>	<i>Percentage of Achievements with LOS of 364 or fewer days</i>
BAME	28%
White	29%

Mandating minimum 20% off-the-job training

56) In the current system Specification of Apprenticeship Standards for England (SASE) sets out further guidance, in addition to Apprenticeships, Skills, Children and Learning (ASCL) Act, on how much of an Apprenticeship must be off-job training (30%), which employers are required to adhere to. For reformed Apprenticeships the amount of off-the-job training was mandated to a minimum of 20% or equivalent, with the expectation that this would be genuine off-the-job training. It was noted within the Implementation plan that ways to ensure that this happens in practice would be explored as part of the Trailblazer development process with the expectation that all Apprentices would benefit from genuine training away from their day-to-day job.

57) An initial screening assessment has been made on the impact on the protected characteristics of age, gender, disability and race and the findings are summarised in the following paragraphs.

Age

58) Table 5 shows that older learners (those aged 25+) have a lower tendency to do Apprenticeships with off-the-job training than their counterparts aged 16-18 and marginally lower than their counterparts aged 19-24. Consequently they may be disproportionately affected by the more rigorous enforcement of the requirement for off-the-job training.

59) This is intended to be a positive impact, the requirement ensuring that 25 year olds receive a more rigorous and high quality training experience in line with their younger counterparts. A risk is that existing Apprenticeships that offer no off-the-job training disappear from the market and are not replaced with equivalent roles which comply with the new requirements, thereby reducing opportunities for older learners. However where there is no off-the- job training offered, we do not consider this to be an Apprenticeship.

Table 5: Percentage of learners by age group who did off the job training as part of their Apprenticeship

<i>Age</i>	<i>off the job training</i>	<i>no off the job training</i>
Under 19	80%	20%
19-24	75%	25%
25+	66%	34%
TOTAL	73%	27%

Gender

- 60) Table 6 shows a slightly lower proportion of female learners tend to do Apprenticeship training with off-job training than their male counterparts. However, we do not believe that this is a significant difference, and the changes could signal a positive impact experienced by female Apprentices.

Table 6: Percentage of learners by Gender who did off the job training as part of their Apprenticeship

<i>Gender</i>	<i>off the job training</i>	<i>no off the job training</i>
Female	69%	31%
Male	77%	23%
TOTAL	73%	27%

Disability

- 61) Table 7 shows that the proportion of Apprentices classified as LLDD receiving off-the-job training is marginally lower than non LLDD Apprentices. However, we do not believe that difference is significant.

Table 7: Percentage of learners registered with a learning difficulty or disability that did off the job training as part of their Apprenticeship

<i>Disability</i>	<i>off the job training</i>	<i>no off the job training</i>
LLDD	68%	32%
non LLDD	73%	27%
TOTAL	73%	27%

Ethnicity

- 62) Table 8 shows that a marginally lower proportion of BAME learners tend to do Apprenticeship training involving off-the-job training than their White counterparts. However, we do not believe that this difference is significant

Table 8: Percentage of learners by major ethnic group that did off-the-job training as part of their Apprenticeship

<i>Ethnic group</i>	<i>off the job training</i>	<i>no off the job training</i>
White	74%	26%
BAME	68%	32%
TOTAL	73%	27%

Employer Designed standards

- 63) To date we have 37 Trailblazer projects developing at least one standard each. These cover a wider range of sectors and occupations, including areas where there are currently Apprenticeship Frameworks and wholly new areas for the

programme. We do not yet have a sense of what the final footprint of the reformed Apprenticeship programme will be. The Apprenticeship programme is a demand led programme and will only be offered in occupations and locations where employers are prepared to offer them and where Apprentices will require 12 months of sustained and substantial training to achieve full competence. Consequently we are unable to conduct an assessment of the impact of this aspect of reform on groups with the protected characteristics of age, gender, disability and ethnicity.

- 64) However there are reasons to believe that a negative impact on these groups is unlikely. Employers are obligated, through the Equality Act to avoid discriminating against any groups of people with protected characteristics. Therefore any programme or standard developed by employers should, by law, have no disproportionate impact on any of those groups. Likewise, employers must avoid discrimination when they recruit Apprentices through the new programme.
- 65) In addition, this is an area we will continue to monitor as we implement the reformed programme, via the monitoring of management information and the independent evaluation. We hope to see Apprenticeships offered in the future in a wider range of occupations and at a wider range of levels, so they are viable options for people of all ages and ability.

Funding Reform

- 66) The new funding model to test on standards-based starts in academic year 2014/15 has now been fixed and is detailed in Table 9 below:

Table 9: New Funding Model

Maximum core Government contribution (£2 for every £1 from employer)		Cap 1	Cap 2	Cap 3	Cap 4	Cap 5
		£2,000	£3,000	£6,000	£8,000	£18,000
Additional incentive payments	Recruiting a 16-18 year old	£600	£900	£1,800	£2,400	£5,400
	For a small business (<50)	£500	£500	£900	£1,200	£2,700
	For successful completion	£500	£500	£900	£1,200	£2,700
Maximum total Government contribution		£3,600	£4,900	£9,600	£12,800	£28,800

- 67) Government will contribute two thirds of the cost of the external training and assessment of the Apprentice up to the cap to which the relevant standard has been allocated. The employer will be required to contribute the remaining third because co-investment is at the heart of the government's objective of incentivising employers to drive up Apprenticeship quality and demand value for money in future. Government will also provide incentive payments for small

businesses employing Apprentices of any age, for companies employing 16-18 year old Apprentices and for successful completion as detailed in Table 9. English and maths will be fully funded (at the rate of £471 per subject) up to Level 2. This model may be subject to revision from academic year 2015/16 following its trialling in academic year 2014/15.

- 68) The following paragraphs outline how the effects on groups with the protected characteristics of age, gender, disability and ethnicity have been considered to date.

Age

- 69) Under the current system, 16-18 year old Apprentices are fully funded, whilst the Government pays 50% or less of the framework rate for Apprentices aged 19 and over depending on the age of the Apprentice and size of employer.
- 70) As detailed above, under the new funding model to be trialled through AY14-15 standard-based starts, employers will be required to contribute one third of the external training and assessment costs in relation to Apprentices of all ages. However, it is recognised that younger Apprentices (particularly those aged 16 - 18) require a greater level of supervision, guidance, education and induction into the workplace. This is why we have built an additional incentive payment relating to the employment of 16-18 year old Apprentices into the new model. This is the equivalent of 30% of the relevant MGC. The policy intention is not to alter the relative attractiveness of Apprenticeships between learners of different ages – indeed this is a continuation of the current funding system which favours 16-18 year olds. We will be able to monitor and respond to any adverse impact through existing management information.

Gender

- 71) We have been unable to find any information that funding reforms would have an adverse effect on employees of a particular gender.

Learning Difficulties or Disability¹⁸

- 72) Under reformed Apprenticeship funding, Apprentices aged 19 to 24 subject to a Learning Difficulty Assessment (LDA) or, in future, an Education, Health and Care Plan (EHCP), will continue to be treated for funding purposes as 16-18 year olds (i.e. they will receive an equivalent funding supplement). In addition, Learning Support will be retained for reformed Apprenticeships to enable providers to claim any additional expenses incurred in delivering support for learners with an identified learning difficulty or disability.
- 73) As the existing support for LDD is being retained under Reformed Apprenticeships, no further assessment of impact on groups with this protected characteristic was necessary.

Ethnicity

¹⁸ For detail, see paragraphs 26-30 of the Technical Consultation:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/302235/bis-14-597-future-of-apprenticeships-in-england-funding-reform-technical-consultation.pdf

- 74) We were unable to find any information that funding reforms would have an adverse effect on groups of employees with the protected characteristic of ethnicity.

Other (non-protected) factors

- 75) In the current funding system for Apprenticeships there are several ring-fenced funding supplements which can be reclaimed in certain situations. Supplements for disadvantage (in terms of the learner's postcode) and area costs (for providers located in high cost regions) will no longer be ring-fenced. Employers (through whom funding will flow in the new system) will still be able to claim more funding for learners who cost more to train, but will now have to contribute a third of that cost themselves.
- 76) We have assessed the impact of this change and conclude that there is a risk that learners from disadvantaged areas or located in the high cost areas of London and the South East may be less likely to be hired as Apprentices. However we cannot link this change specifically to any of the groups that are protected by the Equality Act. Additionally we cannot determine the likelihood of this risk materialising or its potential scale. We therefore plan to monitor management information so that we are in a position to address any impact that arises as a result of this risk.

Summary

- 77) This section summarises the seven elements of reformed Apprenticeships in terms of the protected characteristics for which evidence of impact was found:
- i. *English and maths policy*: Initial plans were modified in the light of equality impact analysis. There is no evidence that the current proposals have any inequality implications.
 - ii. *End point assessment policy*: There is no conclusive evidence that end point assessment or independent assessment favours males over females or vice versa. There is a lack of evidence on the impact of linear and modular assessment on pupils with special educational needs.
 - iii. *Grading policy*: There is limited or inconclusive evidence on whether different grading approaches impact disproportionately on any groups with protected characteristics.
 - iv. *Removal of duration flexibilities for Apprentices over 19*: By definition, this reform will affect over 19s more than 16-18 year olds. The intention is to drive up quality for older learners. There is not expected to be any significant difference in the impact of this change on groups with protected characteristics.
 - v. *Mandating minimum 20% off-the-job training*: Older learners (aged 25+) are likely to be more affected by this policy change. The change is intended to be positive – ensuring older learners receive a more rigorous training experience but there is a risk that Apprenticeship opportunities for older learners will decrease. This risk will need to be monitored.

- vi. *Employer designed standards:* We have been unable to conduct an assessment but will monitor impacts on groups with protected characteristics as far as the data allows us to.
- vii. *Funding reform:* There is the potential for changes to impact differently on learners aged 16-18 and 19+ so this will be monitored. There are not expected to be implications for other protected characteristic groups.

Monitoring and review

- 78) The TUC, Apprenticeship Unit and the Skills Funding Agency hosted a conference, “Apprenticeships and Equality: A call to action” in April 2014. The conference focused on Apprenticeships and equality in light of the recent unionlearn/National Apprenticeship Service research on “under-representation in Apprenticeships” and discussed what needs to be done to make sure Apprenticeships are accessible and achievable by all.
- 79) Several high profile speakers including leading employers, campaigners, trade union leaders and government officials will set out a call to action to ensure equality is a fundamental part of the Apprenticeship programme.
- 80) The Implementation Plan stated that as the reforms were radical and far-reaching, it was essential that their impact was carefully monitored and evaluated. This included measuring how the impact of the reforms varied by factors such as the gender, age, ethnicity, disability of Apprentices. The headline indicators used would aim to capture the following:
 - a) number of Apprenticeship starts and achievements;
 - b) number of workplaces offering Apprenticeships;
 - c) amount and quality of training, including both on- and off-the-job training;
 - d) Apprentice and employer satisfaction;
 and in each case be broken down further where data is available to allow us to monitor the impacts on groups with protected characteristics.

Responsibility

- 81) This assessment was completed by Ian Harrop, Peter Blyth, Esther Horner and Ana Cavilla, Joint Apprenticeships Unit with contributions from James Wall. Approval was given by Frank Bowley, Head Economist in the VE Directorate, on 11 July 2014 and by Jennifer Coupland, Head of the Joint Apprenticeships Unit, on 26 August 2014.

Annex A: Summary of Data Covering Current System

82) Tables A1 & A2 below show Apprenticeship programme participation over the last 5 complete years for which data are available by level and age.

Table A1: All Age Apprenticeship Participation by Level (2008/09 to 2012/13)

Numbers	2008/09 Full Year	2009/10 Full Year	2010/11 Full Year	2011/12 Full Year	2012/13 Full Year
Intermediate Level Apprenticeship	273,600	304,000	415,200	506,200	501,700
Advanced Level Apprenticeship	170,900	185,500	247,200	317,000	377,000
Higher Apprenticeship	300	1,700	3,500	5,700	13,000
All Apprenticeships	444,800	491,300	665,900	806,500	868,700

Percentage	2008/09 Full Year	2009/10 Full Year	2010/11 Full Year	2011/12 Full Year	2012/13 Full Year
Intermediate Level Apprenticeship	62%	62%	62%	63%	58%
Advanced Level Apprenticeship	38%	38%	37%	39%	43%
Higher Apprenticeship	0%	0%	1%	1%	1%
All Apprenticeships	100%	100%	100%	100%	100%

Table A2: Apprenticeship Programme Participants by Age (2008/09 to 2012/13)

Numbers	2008/09 Full Year	2009/10 Full Year	2010/11 Full Year	2011/12 Full Year	2012/13 Full Year
Under 19	173,900	186,400	203,100	189,600	181,300
19-24	191,800	210,900	251,900	272,100	294,500
25+	79,100	93,900	210,900	344,800	392,900
Total	444,800	491,300	665,900	806,500	868,700

Proportion	2008/09 Full Year	2009/10 Full Year	2010/11 Full Year	2011/12 Full Year	2012/13 Full Year
Under 19	39%	38%	31%	24%	21%
19-24	43%	43%	38%	34%	34%
25+	18%	19%	32%	43%	45%
Total	100%	100%	100%	100%	100%

83) The large increase in participation from 2010/11 onwards was predominantly due to a large increase in adult Apprenticeships, especially in those over the age of 25. Participation in Intermediate Apprenticeship fell between 2011/12 and 2012/13. This largely reflecting the measures introduced to improve the quality of Apprenticeships (i.e. removal of funding for short duration Apprenticeships) in 2012/13. For this reason we have sought to use 2012/13 data wherever possible in the equality impact assessment.

Table A3: Demographic summary of Apprenticeship programme participants in 2012/13

	Funded Apprentices Apprenticeships				%
	Intermediate Level Apprenticeship	Advanced Level Apprenticeship	Higher Apprenticeship	Total Apprenticeships	
Total Learners	501,700	377,000	13,000	868,700	100.0%
Age					
Under 19	132,600	54,800	800	181,300	20.9%
19-24	167,200	132,500	4,200	294,500	33.9%
25-49	167,700	166,000	6,900	334,600	38.5%
50+	34,200	23,700	1,000	58,300	6.7%
Unknown	-	-	-	-	-
Gender					
Female	249,800	210,500	8,300	455,600	52.4%
Male	251,800	166,500	4,700	413,100	47.6%
Learners with Learning Difficulties and/or Disabilities					
Learning Difficulty/Disability	44,600	26,600	600	70,100	8.1%
No Learning Difficulty/Disability	449,500	345,200	12,200	785,800	90.5%
Not Known	7,600	5,200	200	12,800	1.5%
Ethnicity					
Asian/ Asian British	19,900	13,100	500	32,800	3.8%
Black/ African/ Caribbean/ Black British	16,000	12,600	300	28,500	3.3%
Mixed/ Multiple Ethnic Group	9,700	6,600	200	16,200	1.9%
White	447,000	338,800	11,700	776,200	89.4%
Other Ethnic Group	3,900	2,200	-	6,000	0.7%
Not Known/Not Provided	5,200	3,700	200	9,000	1.0%

84) Table A3 shows that in 2012/13, 20.9 % of Apprentices were aged under 19, 33.9 % were aged 19-24 and 45.2% were aged 25 and over. 52.4% of Apprentices were female; 8.1% had a Learning Difficulty or Disability (LDD) recorded and 9.7% were known to be from a Black and Minority Ethnic (BAME) background.

85) From tables A4 and A5 below it can be seen that over three quarters of the level 2 starts in 2012/13 were in the Business, Administration & Law , Health, Public Services & Care and Retail & Commercial Enterprise sectors, and starts in these sectors also accounted for over 70% of all level 3 starts in 2012/13.

Table A4: Apprenticeship Programme Starts by Sector Subject Area and Level (20012/13)

Sector Subject Area	Level	Intermediate	Advanced	Higher	All
Agriculture, Horticulture and Animal Care		4,690	2,390	10	7,090
Arts, Media and Publishing		240	880	10	1,120
Business, Administration and Law		91,020	63,540	5,850	160,410
Construction, Planning and the Built Env.		10,470	3,210	60	13,730
Education and Training		1,810	6,240	-	8,050
Engineering and Manufacturing Tech.		38,720	27,470	220	66,410
Health, Public Services and Care		58,090	62,260	3,010	123,370
Information and Communication Tech.		5,440	8,270	420	14,120
Languages, Literature and Culture		-	-	-	-
Leisure, Travel and Tourism		7,640	6,720	-	14,360
Preparation for Life and Work		-	-	-	-
Retail and Commercial Enterprise		74,570	26,450	230	101,240
Science and Mathematics		70	250	-	320
Unknown		-	-	-	-
Grand Total		292,800	207,700	9,800	510,200

Table A5: Percentage of Apprenticeship starts by Level and Sector Subject Area, 2012/13

Sector, Subject Area	Intermediate	Advanced	Higher	Total
Agriculture, Horticulture and Animal Care	2%	1%	-	1%
Arts, Media and Publishing	-	-	-	-
Business, Administration and Law	31%	31%	60%	31%
Construction, Planning and the Built Env.	4%	2%	1%	3%
Education and Training	1%	3%	-	2%
Engineering and Manufacturing Tech.	13%	13%	2%	13%
Health, Public Services and Care	20%	30%	31%	24%
Information and Communication Tech	2%	4%	4%	3%
Languages, Literature and Culture	-	-	-	-
Leisure, Travel and Tourism	3%	3%	-	3%
Preparation for Life and Work	-	-	-	-
Retail and Commercial Enterprise	26%	13%	2%	20%
Science and Mathematics	-	-	-	-
Unknown	-	-	-	-
Total	100%	100%	100%	100%

Percentages do not add to 100. This is because an Apprentice is counted once in the total, and once for each level they participate in.

Annex B: Previous Equality Impact Analysis of Mandating English and Maths Achievement

- 86) The independent Richard Review recommended that all Apprentices must achieve a Level 2 in English and maths. However, after initial analysis, set out below, achievement of Level 2 achievement in English and maths in all Apprenticeships was not mandated.
- 87) We posed questions around the original proposal from Doug Richard on English and maths in the consultation. One concern raised by employers was that it would be difficult to recruit Apprenticeships to intermediate Apprenticeships if they had to achieve Level 2 English and maths. Responses from Apprentices showed they were divided on the benefits of Level 2 English and maths. Some could see the benefit of acquiring transferable skills for all aspects of life, whilst others thought the requirement would be a significant barrier to accessing an Apprenticeship.
- 88) The potential exclusion of 'non-academic' learners who would nonetheless be very technically competent was mentioned by stakeholders very frequently, more than any potential benefits for Apprentices or employers. Many providers claimed that it would be very challenging for some Apprentices to achieve Level 2 English and maths in the course of their Apprenticeship.
- 89) Analysis of the number of steps required to reach Level 2 in English and maths for learners taking Intermediate Apprenticeships showed that a requirement to achieve level 2 in English and maths in order to complete the Apprenticeships was:
- a) reasonable for 16 – 18 year olds as only 3% were likely to be below Level 1 in one or both of English and maths and therefore may struggle to reach Level 2 in both English & maths;
 - b) reasonable but more challenging for the 19-24 age group as around a fifth of 19 – 24 year olds may find it difficult to achieve L2 in both English and maths as they have prior attainment below L1 in one or both subjects;
 - c) very challenging for the 25 and over group, as the level of prior attainment of nearly half of this group is unknown, with the worst case scenario being that it is below Level 1, meaning that half of this group would struggle to achieve Level 2 in an Apprenticeship.
- 90) It should be noted though that the data source used for the 19 and over grouping asks about prior attainment using GCSE and O level qualifications and therefore actual achievements in L2 English and Maths could be 10-15 points higher than estimated using GCSEs/O-levels alone because other English and maths qualifications (Key Skills or Functional Skills) are not identified.
- 91) Analysis of prior qualifications in maths and English by groups with other protected characteristics was also carried out but is not presented here.

Annex C: List of organisations consulted

The following organisations responded to the consultation. There were also responses from a number of individuals.

2nd Chance Project
The 157 Group
A4e Ltd
AAT
Action Duchenne
Active Synergy Development Services Ltd/National School Sport Apprenticeships Ltd
Adur & Worthing Councils
Age UK
Agilisys Arch
Airbus in the UK
Alliance for Inclusive Education (ALLFIE)
Alstom Power Thermal Services
Apprenticeship Ambassadors Network (AAN)
Arc Energy Resources Ltd
ASDA
Aspire Achieve Advance Limited
Aspire Group
Asset Skills
Association for Consultancy and Engineering
Association of Colleges (AoC)
Association of Employer and Learning Providers (AELP)
Association of Learning Providers for Hampshire and the Isle of Wight
Association of Licensed Multiple Retailers
Association of School and College Leaders
Association of Teachers and Lecturers (ATL)
Axia Solutions Ltd
B&NES
Babington Group (Babington Business College and Training for today)
Barchester Healthcare
Berthon Boat Company Ltd
BIIAB
Binbrook Adult Learning Centre
Birmingham City University (BCU)
Bishop Burton College
BMW UK Ltd
Bournemouth and Poole College
Bradford College
Bright Kids
Bristol City Council
British Ceramic Confederation (BCC)
British Dyslexia Association
British Glass Manufacturers' Confederation
British Institute of Facilities Management
British Marine Federation
British Private Equity and Venture Capital Association
British Retail Consortium (BRC)
BT
Buckinghamshire Business First
Buckinghamshire County Council

Building Engineering Services Training Ltd
 Burnley Borough Council
 Burton and South Derbyshire College
 Business in Sport and Leisure Ltd
 Business Services Association
 Cambridgeshire County Council
 Careers South West Ltd
 Caretech
 Carillion plc
 Catch22
 CBI
 Centre for Economic Performance London School of Economics and Political Science
 Centrepont
 Chartered Institute for Securities & Investment (CISI)
 Chartered Institute of Building (CIOB)
 Chartered Institute of Legal Executives
 Chartered Insurance Institute
 Children's Links
 CITB
 City & Guilds
 City College Peterborough
 Civil Engineering Contractors Association
 CMS Vocational Training Ltd
 Cogent Sector Skills Council
 Colchester Borough Council
 Computer Village Limited and Bugler Coaches Limited
 Confederation of Passenger Transport
 UK (CPT)
 Cornwall College
 County Battery Services Ltd
 Crafts Council
 Craven College
 Creative & Cultural Skills
 Creative Skillset
 Cskills Awards
 D&AD
 DART Ltd
 Dart Training
 Derbyshire and Nottinghamshire Chamber of Commerce
 Derbyshire County Council – Adult Community Education Service
 Devon & Cornwall Training Provider Network
 Dimensions Training Solutions Ltd
 Dudley College
 Durham County Council
 EAL
 Early Years' Service at Essex County Council
 East Riding College
 East Riding of Yorkshire Council
 ECITB
 Education + Training Skills
 Education for Engineering (E4E)
 EEF
 Electrical Contractors' Association
 Employment Lawyers' Association
 Energy & Utility Skills

Engineering and Machinery Alliance (EAMA)
 Engineering Council
 Enhance hair styling and beauty
 e-skills UK
 Exeter & Heart of Devon (EHOD) Employment & Skills Board
 FDQ
 FE Associates
 Federation for Industry Sector Skills and Standards
 Federation of Awarding Bodies
 Federation of Master Builders
 Federation of Small Businesses
 Focus Training (SW) Ltd
 Food and Drink Federation
 Forum of Private Business
 Forward Steps Training Limited
 Freelance Trainer & Personal Coach
 Gas Industry Safety Group
 Gateshead Council and Gateshead Strategic Partnership
 Gatsby Charitable Foundation
 GHNHSFT
 Glenside Education Ltd
 Greater Manchester Skills and Employment Partnership
 Green Lantern Training Company
 GTA England
 Habia (Hair and Beauty Industry Authority)
 Hair Academy
 Havering College of Further & Higher Education
 Hawk Training
 Heart of England Training
 Hertfordshire PASS
 Highbury College
 HIT Training Ltd
 HP Consultancy and Training
 Hull City Council
 Huntingdonshire Regional College
 ifs School of Finance
 IMI Awards Ltd
 IMPACT Apprenticeships
 Improve
 Industry Apprentice Council (IAC)
 Ingeus UK
 Inspiring Apprenticeships – Cheshire & Warrington LEP
 Institute for Archaeologists
 Institute of Chartered Accountants in England and Wales (ICAEW)
 Institute of Directors
 Institute of Leadership & Management
 Institute of Money Advisers
 Institute of the Motor Industry (IMI)
 Interserve
 ITS Ltd
 Jaguar Land Rover Limited
 JSSC group
 JTL Training
 Kaplan Professional Awards (KPA)
 KEITS Training Services Ltd

Kent County Council
 Key Training
 Kirklees Apprenticeships Development Group and Kirklees Employment and Skills Board
 Lancashire WBL Executive Forum
 Landex
 Lantra
 League Football Education
 Learndirect
 Leeds City College
 Leeds City Council Apprenticeship Hub
 Lee Valley Regional Park Authority
 Lifetime Training
 Linkage Community Trust
 Liverpool City Region
 Livery Companies Skills Council
 Local Government Association (LGA)
 London Borough of Newham
 London Capital Colleges
 London Chamber of Commerce and Industry
 London Councils
 London Work Based Learning Alliance
 Manchester City Council Apprenticeships Strategy Group
 Manufacturing Technologies Association
 Maritime Skills Alliance
 Mathematics in Education and Industry
 McDonald's
 Mercedes-Benz UK
 Merseyside Colleges' Association
 Meynell Games Group
 Mid Kent College
 Ministry of Defence
 Morrison Supermarkets
 MPQC
 NASUWT
 National Deaf Children's Society
 National Federation of Roofing Contractors
 National Forum of Engineering Centres
 National Foundation for Educational Research (NFER)
 National Hairdressers' Federation
 National Housing Federation
 National Institute of Adult Continuing Education (NIACE)
 National Skills Academy for Nuclear and the Nuclear Institute
 National Training Federation for Wales
 National Union of Students
 Natspec (Association of National Specialist Colleges)
 Newbury College
 Newham College
 NFU
 NHS
 NHS Employers
 Nissan Motor Company
 NOCN
 Northamptonshire NHS Apprenticeship Hub
 Northumberland County Council
 Northumbria Learning Providers

North Yorkshire County Council
NVQ consultants
OCR Examinations
Ofqual
Ofsted
OPITO
Oxfordshire County Council on behalf of Oxfordshire Skills Board
Partnership Development Solutions (PDS)
PATA Assessment & Training Centre
Pearson Education Ltd
Pennine Lancashire Employment and Skills Board
People 1st
Peterborough Regional College
Peter Jones Foundation
PGL Travel
PLASA
PricewaterhouseCoopers LLP (PwC)
Prospect
Prospects
Puffins of Exeter Ltd
Quality Assurance Agency for Higher Education (QAA)
Rank Group Plc
Reaseheath College
Recruitment & Employment Confederation
Redbridge College
Reflections Training (House of Clive)
Remploy Employment Services
Renishaw PLC
Retail Motor Industry
RGFE
Royal Academy of Engineering
Royal Borough of Greenwich
Royal College of Midwives
Runnymede Trust
Rural Area College
S&B Automotive Academy
Sandwell College
Science Council
Seetec
Semta
SETA, the Southampton Engineering Training Association
Siemens plc
Signature
Skillnet Ltd
Skills CFA
Skills for Care and Development
Skills for Security Ltd
Skillsmart Retail UK Limited
Society of Motor Manufacturers and Traders (SMMT)
Somerset Employment and Skills Board
South and City College Birmingham
South Devon College (General FE & HE)
South Kent and West Kent College (K College)
South West Apprenticeship Company
SQA

SQA Accreditation
Staffordshire Providers Association
Strode College
Stubbing Court Training Ltd.
SummitSkills
Surrey County Council
Technician Council
Tees Valley Unlimited
Tesco
Thames Valley Police
Tops Day Nurseries
Training 2000 Ltd
Training for Bradford Ltd/Bradford College
Transport Salaried Staffs' Association (TSSA)
Troika Contracting Limited
TUC
UCAS
UK Commission for Employment and Skills
UK Contractors Group (UKCG)
UK Music
UKTD
United Housing Association/BCHF
Unite the Union
University and College Union
University College Birmingham
University Vocational Awards Council
Via Partnership Ltd
Walsall College
Warwickshire County Council
West Midlands Training Provider Network
West of England Local Enterprise Partnership
West Sussex County Council
West Yorkshire Learning Providers
Weston College
Wiltshire Council on behalf of the Swindon & Wiltshire LEP
Wirral Economic Development & Skills Partnership
Wolverhampton City Council
WorldSkills International
York College
Yorkshire Housing

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